

Robert S. Wagner, OSB #84411  
Stan LeGore, OSB #94369  
MILLER & WAGNER LLP  
Trial Lawyers  
2210 N.W. Flanders Street  
Portland, OR 97210-3408  
Telephone: (503) 299-6116  
Facsimile: (503) 299-6106  
E-mail: [rsw@miller-wagner.com](mailto:rsw@miller-wagner.com)

Of Attorneys for Defendants City County Insurance Services Trust,  
Rod Brown, and Public Safety Liability Management Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

WAYNE McFARLIN,	)	
	)	
Plaintiff,	)	Case No. CV06-1594 HU
	)	
v.	)	DECLARATION OF ROD BROWN IN
	)	SUPPORT OF DEFENDANTS BROWN,
EDWARD GORMLEY, an individual; CITY	)	CITY COUNTY INSURANCE SERVICES,
OF McMinnville, a Municipal	)	AND PUBLIC SAFETY LIABILITY
Corporation; CITY COUNTY INSURANCE	)	MANAGEMENT, INC.'S MOTION FOR
SERVICES TRUST; ROD BROWN, an	)	SUMMARY JUDGMENT
individual; PUBLIC SAFETY LIABILITY	)	
MANAGEMENT INC., an Oregon	)	
corporation; WALDO FARNHAM,	)	
	)	
Defendants.	)	

I, Rod Brown, make this Declaration upon personal knowledge.

1. I am a named defendant in the above-entitled matter.
2. During my deposition in June, 2006, I was asked about my billing for work performed at the request of the City of McMinnville during the Fall of 2005. I am the sole owner and employee of defendant Public Safety Liability Management, and do consulting work for Oregon public bodies as well as for defendant City County Insurance Services (CCIS).
3. At the time of my deposition I had not reviewed my billing records. I testified

that I did not bill for part of the work, and billed the City of McMinnville for the remainder of the services provided.

4. After review of my records, I discovered that I billed CCIS for part of the consulting work I did for the City of McMinnville. Therefore, part of my services were billed to CCIS, part were billed to the City of McMinnville, and part of my services were provided to the City without charge.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2007.

  
Rod Brown

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF ROD BROWN IN SUPPORT OF DEFENDANTS CITY COUNTY INSURANCE SERVICES TRUST, ROD BROWN, AND PUBLIC SAFETY LIABILITY MANAGEMENT, INC.'S MOTION FOR SUMMARY JUDGMENT, on the following parties at the following addresses by notice of electronic filing using the CM/ECF system:

Terrence Kay  
Attorney at Law  
3155 River Road S., Suite 150  
Salem, OR 97302  
503-588-1944  
[terrence@kaylawfirm.com](mailto:terrence@kaylawfirm.com)  
Of Attorneys for Plaintiff

Karen O'Kasey  
Hoffman, Hart & Wagner  
Attorneys at Law  
1000 S.W. Broadway, 20<sup>th</sup> Floor  
Portland, OR 97205  
503-222-4499  
[kok@hhw.com](mailto:kok@hhw.com)  
Of Attorneys for Defendants Gormley and City of McMinnville

Walter H. Sweek  
Cosgrave Vergeer Kester LLP  
Attorneys at Law  
805 S.W. Broadway, 8<sup>th</sup> Floor  
Portland, OR 97205  
503-323-9000  
[wsweek@cvk-law.com](mailto:wsweek@cvk-law.com)  
Of Attorneys for Defendant Farnham

DATED this 12<sup>th</sup> day of October, 2007.

  
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Stan LeGore, OSB #94369